- 1 The data below reflects mission partner responses to questions designed to measure progress against
- 2 major initiatives outlined in the 2012 National Strategy for Information Sharing and Safeguarding
- 3 (NSISS), and other significant accomplishments of the terrorism and homeland security information
- 4 sharing and access community.
- 5 Primarily using 2012's Performance Assessment as a baseline, the goal of this assessment was to identify
- 6 progress made towards information sharing with respect to the NSISS and the annual ISE
- 7 Implementation Guidance while respecting the existing reporting burden on the ISE Departments and
- 8 Agencies.

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## 2014 Performance Assessment Questionnaire (PAQ) Response Aggregation

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### 36 Narrative Summary

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Goal 1: Drive Collective Action through Collaboration and Accountability

Use governance models that enable mission achievement; adopt common processes to build trust, simplify the information sharing agreement development process, and support progress through performance management, training, and incentives.

### **GOAL 1 TOP LEVEL PERFORMANCE FINDINGS:**

Responses to the 2014 ISE Performance Assessment Questionnaire indicate that, at the department and agency level, training that supports information sharing and the use of performance incentives to reinforce the implementation of this training are increasingly being implemented. In addition, efforts to standardize agency-level services – like DOJ and DHS's work to consolidate systems that share suspicious activity reports – and agency procedures for sharing information with external partners continue to mature. However, responses also indicate that there may be value in increased efforts on the part of the administration and/or congress to ensure individual agencies also implement ISE priorities in ways that extend beyond the immediate needs of their missions. An overarching agency culture of information sharing and collaboration relies upon cultural and administrative incorporation of information sharing throughout all agency departments and communities. Finally, departments and agencies responded that they are generally satisfied with the progress of the National Network of Fusion Centers and feel well informed of the performance of the National Network.

Mission-Specific Training that Supports Information Sharing and Collaboration: 80% of ISE mission partners responded that they have matured their implementation of mission-specific training that supports information sharing and collaboration over the past three years. (ALL)

**Performance Appraisals:** 85% of agencies responded that for employees that support ISE-related priorities, 'information sharing and collaboration' is a component of their employee performance reviews. This reflects a year over year improvement that has been consistent over the last three years. However, only 50% of agencies responded that their employees without direct ISE responsibilities have similar performance measures, which reflects a year over year decline. (ALL)

**National network of fusion centers:** 100% of agencies responded to being satisfied to extremely satisfied with progress made in the last 12 months to improve capabilities and performance,



and the majority of agencies reported that they feel well informed about Fusion Center performance through either receiving the annual National Fusion Center Final Report from DHS, or through other engagements. (ALL)

**Suspicious Activity Reporting (SAR) Training:** Responses indicate that there has been a steady increase in SAR front line training over the last 3 years. (ALL)

**Standardizing Agency-Level Services:** DHS and the DOJ are consolidating the two most widely used suspicious activity reporting systems – the ISE Shared Space network and the FBI's eGuardian system – into a single reporting mechanism. The result will simplify the process for terrorism suspicious activity reporting and allow aggregation of all SAR reporting in a single database to enhance analysis. (ALL)

**Procedures for coordinating foreign partner information sharing:** 85% of agencies responded that they have both internal and external procedures for coordinating foreign partner information sharing engagement activities. (ALL)

**Government wide templates for developing information sharing agreements:** Only 42% of agencies responded that they use a government wide template in developing information sharing agreements. While this is up from 8.3% in 2011, agencies commented that ad hoc interagency coordination on information sharing initiatives has led to problems. This is indicative of a gap in our ability to coordinate the development and implementation of standard interagency information sharing agreements and is a priority objective of the National Strategy. **(ALL)** 

MOU/MOA development process for data access by external partners: 100% of responding agencies report having a MOU/MOA development process that covers discovery and access to data by external partners and systems. This is a 50% increase over the last 3 years, and indicates that agencies are able to create the appropriate internal authorities. (ALL)

GOAL 2

Improve Information Discovery and Access through Common Standards

Improve discovery and access by developing clear policies for making information available to approved individuals through identity, authentication, and authorization controls, data tagging, enterprise-wide data correlation, common information sharing standards, and a rigorous process to certify and validate individual use.

### GOAL 2 TOP LEVEL PERFORMANCE FINDINGS:

Responses to the 2014 ISE Performance Assessment Questionnaire indicate that most departments and agencies are experiencing improvement to their abilities to discover, access, and retrieve information from external agencies and systems. Responses suggest that there is a lack of progress by departments and agencies on procuring or acquiring data tagging capabilities that employ common, interoperable metadata standards – the exceptions to this



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are capabilities used to produce intelligence products and that leverage IC ITE data encoding specifications and/or that must comply with ICD 501 standards. Responses also suggest that there has been little to no increase in the use of ISE functional or technical standards by departments and agencies when issuing mission system RFPs and/or grants – this may be caused by the fact that ISE Mission Partners have not prioritized an agreed upon approach to standards based acquisition.

Participation in development of joint, interoperable geospatial reference architecture (with emphasis on GeoPlatform): DHS, DOC, and DOI responded that they are participating in the development of joint, interoperable geospatial reference architectures. DHS's NIEM PMO is engaging with the Open Geospatial Consortium (OGC) to assist in validating NIEM 3.0 architectural designs for support of the Intelligence Community's Data Encoding Specifications as well as demonstrating use of an API for manipulation of GML feature representations using NIEM components. Recommendations resulting from this collaborative work with OGC is expected to be delivered to the NIEM PMO for vetting in late FY14. (DHS,DOC,DOI, ODNI)

Use of ISE Functional Standards for grants and RFP's: Fewer than 30% of responding agencies reported that they either 'always' or 'often' used ISE functional or technical standards when issuing mission system RFPs and/or Grants for ISE-related systems, and nearly all non-title 50 ISE agencies reported that they 'never' use ISE functional or technical standards when issuing mission system RFPs and/or Grants for ISE-related systems. These response trends have been constant over the last three years. (ALL)

Discovery, access, and retrieval of information from external agencies and systems: 50% of agencies responded that they experienced "some" improvement to their ability to discover, access, and retrieve information needed to accomplish their mission from external agencies and systems. Furthermore, 33% reported experiencing "extensive" improvement. Promising commentary from the State Department reported that the IC enterprise search engine has improved search capability for INR analysts to the JWICS fabric and their Bureau of Consular Affairs, in cooperation with DHS's United States Citizenship and Immigration Services, achieved a major enhancement to their ability to discover, access, and retrieve information needed for visa processing. For many agencies that reported "some" improvement, further progress is expected in pilot programs that are currently in line for completion. (ALL)

Procuring a data tagging capability (on each security domain) that employs common, interoperable metadata standards: 46% of agencies responded that they have made little or no progress in acquiring or procuring a data tagging capability on each security domain that employs common, interoperable metadata standards. For those agencies that did report progress, the responses suggest that systems used to produce intelligence products that must comply with ICD 501 and/or IC ITE data encoding specifications are more mature. (ALL)

#### GOAL 3

Optimize Mission Effectiveness through Shared Services and Interoperability

Optimize mission effectiveness through shared services, data and network interoperability, and increased efficiency in acquisition.

### GOAL 3 TOP LEVEL PERFORMANCE FINDINGS:

Responses to the 2014 ISE Performance Assessment Questionnaire indicate that, at the department and agency level, there are healthy rates of adoption for strong identity and access management mechanisms and that departments and agencies are planning for and implementing FICAM standards as expected. In addition, the levels at which departments and agencies are planning for and using attribute based access control methods are generally commensurate with the implementation plan for the National Strategy for Information Sharing and Safeguarding. Finally, an interoperable federated search capability for use on networks used by domestic law enforcement and first responders has been tested and implemented.

Obtaining and using agency approved security mechanisms, like a PKI certificate, for ISE-related systems: Over 80% of agencies responded that every member of their agency is required to obtain an agency approved security mechanism, like a PKI certificate, for ISE-related systems. In addition, 72% of responding agencies report that they are using public key infrastructure (PKI) for ISE related information and mission systems on the SBU domain. (ALL)

Connecting with inter-agency SBU/CUI networks in order to share terrorism and homeland security information: 69% of agencies responded that they connect with inter-agency SBU/CUI networks in order to share terrorism and homeland security information. (ALL)

**Planning for and implementing FICAM standards**: 70% of agencies responded that they have aligned their enterprise architecture for identity management (on each security domain) with the FICAM Roadmap; and, 80% of responding agencies report making measurable progress in implementing FICAM standards on the SBU domain specified by the Identity Federations Coordination IFC WG guidance. (ALL)

Leveraging shared services across agencies for attribute information on users: 70% of responding agencies reported that they leverage shared services across agencies for attribute information on users. (ALL)

Data access management plans of action and milestones (POA&M): 60% of responding agencies reported that they have either submitted a data access management POA&M based on attribute access control ahead of schedule or are in the process of devising one. (ALL)

**Testing and implementing a federated SBU Search Tool:** DOJ tested and DHS implemented a federated search capability for interoperable use by Regional Information Sharing Systems (RISS), Law Enforcement Online (LEO), and the Homeland Security Information Network (HSIN). (DHS, ODNI, DOJ)



#### GOAL 5

Protect Privacy, Civil Rights, and Civil Liberties through Consistency and Compliance

Maintain the public trust by increasing the consistency by which Federal departments and agencies apply privacy, civil rights, and civil liberties protections across the government, building corresponding safeguards into the development of information sharing operations, and promoting accountability and compliance mechanisms.

### GOAL 5 TOP LEVEL PERFORMANCE FINDINGS:

Responses to the 2014 ISE Performance Assessment Questionnaire indicate that, at the department and agency level, incorporation of ISE privacy policies with inter-agency training is steadily maturing. A particular area of strength is the leveraging of notification mechanisms by ISE mission partners as part of agency information sharing and safeguarding processes. For the second year, responses show a transition by agencies from ad hoc processes to a standardized implementation of privacy, civil rights, and civil liberties protections in information sharing programs and initiatives. Privacy shows continued progress and consistency in maturation across all ISE mission partners and communities.

- **2014 Performance**: Out of the responses aligned to the 5 NSISS goals, Goal 5 performance is the highest performing goal across the board for every 2014 ISE PAQ participating agency. (ALL)
- Training: P/CR/CL training for internal and external policies and has increased significantly; with 70% of Agencies reporting training on P/CR/CL policies to include their own agency ISE privacy policy. The 2014 ISE Performance Assessment also demonstrated a 40% increase in reporting by agencies who reported having no training in 2013 assessments. (ALL)
- Policy: Nearly all ISE Performance assessment participants reported having P/CR/CL protection
   policies in compliance with current relevant authorities. (ALL)

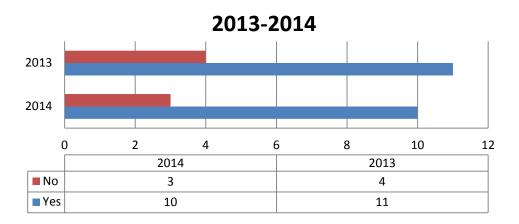
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- 103 Goal 1: Drive Collective Action through Collaboration and Accountability
- 104 Primary Mission Areas: Watchlisting & Screening, Statewise / Regional ISE, Transnational Organized
- 105 Crime(TOC), Domain Awareness, Incident Management
- 106 **Secondary Mission Areas:** Cybersecurity
- 107 **Priority Objective 1:** Align information sharing and safeguarding governance to foster better
- 108 decision making, performance, accountability, and implementation of the Strategy's goals

Does your agency have a governance body or internal process responsible for information sharing and safeguarding that plans and oversees the agency self-assessment process per E.O. 13587? (Secondary

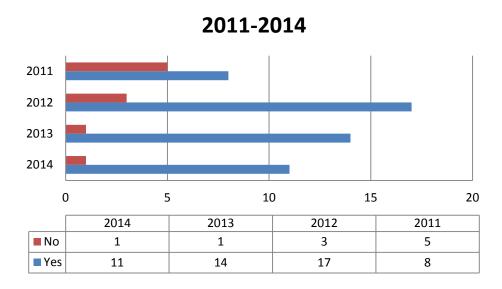
112 <u>Mission Area: Incident Management)</u>



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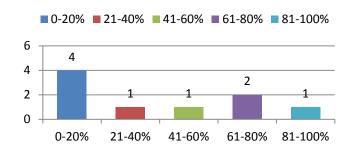
### Does your agency have a dedicated Senior Information Sharing Executive per E.O. 13587? (Secondary

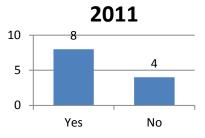
### 116 <u>Mission Area: Incident Management</u>)



# What degree has your agency implemented any mission-specific training that supports information sharing and collaboration?





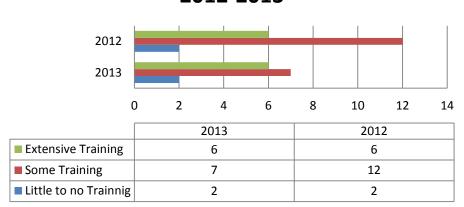


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# 2012-2013



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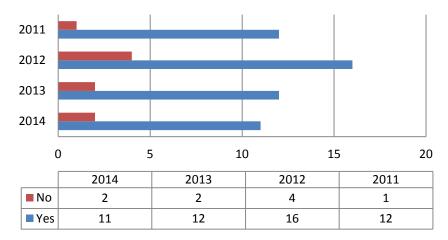
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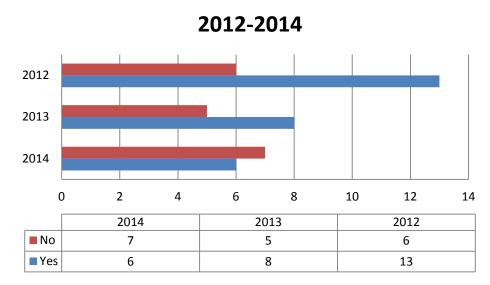
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130 131 132 Do employees that support ISE-related priorities have "information sharing and collaboration" as a component of their performance appraisals?



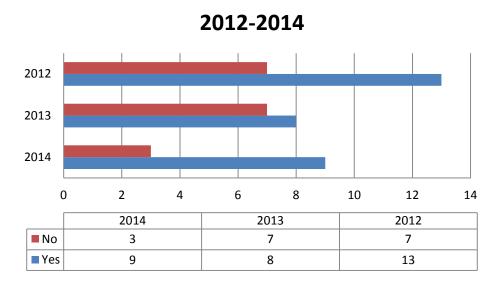
Do employees without direct ISE responsibilities have "information sharing and collaboration" as a performance objective?



2011

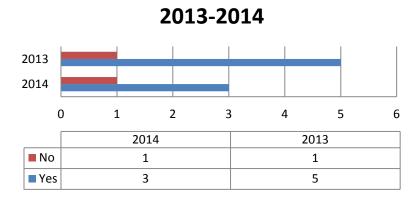
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Does your agency offer information sharing related awards (monetary or Non-monetary)?

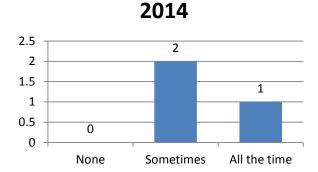


Does your agency update the workforce on new information sharing agreements/initiatives? If Yes, how?

(This question only went to IC components participating in the PAQ)

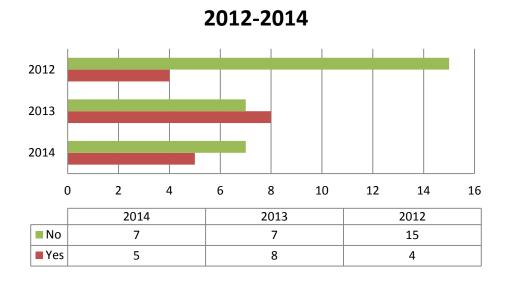


To what extent is your agency utilizing the Library of National Intelligence (LNI)? (This question only went to IC components with only 3 agencies responding)



Priority Objective 2: Develop guidelines for information sharing and safeguarding agreements to
 address common requirements, including privacy, civil rights, and civil liberties, while still allowing
 flexibility to meet mission needs.

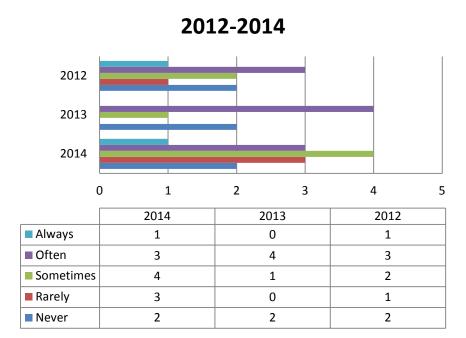
# Does your agency use a government wide template in developing information sharing agreements?



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Priority Objective 13: Promote adherence to existing interagency processes to coordinate information sharing initiatives with foreign partners, as well as adopt and apply necessary guidelines, consistent with statutory authorities and Presidential policy to ensure consistency when sharing and safeguarding information

To what extent is information gathered from international partners integrated into the watch listing and screening process?

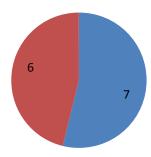


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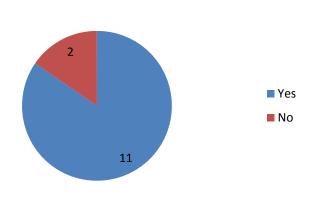
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Does your agency component responsible for foreign information sharing activities have a representative at the PO 13 Working Group meeting?

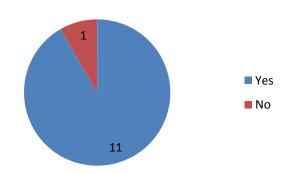


Does your agency have international and external procedures for coordinating foreign partner information sharing engagement activities? If so, describe.



2014

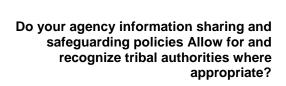
Does your agency have official information sharing arrangement approval process for foreign partner information sharing? If so, describe.

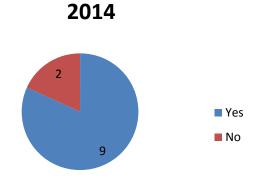


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**Priority Objective 15:** Complete the implementation of the NSI programs in the National Network of Fusion Centers and Federal entities while expanding training and outreach beyond law enforcement to the rest of the public safety community.





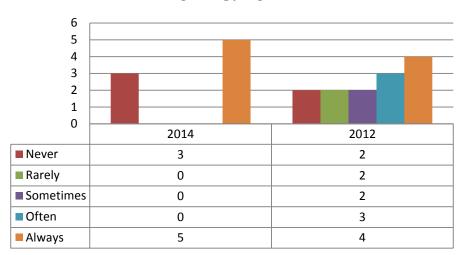
Does your agency provide Suspicious Activity Reporting (SAR) front line training (either directly or indirectly)?

#### 2012-2014 ■ No Yes

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If so, how often does your agency forward All validated SARs to the Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI)?

## 2012 & 2014



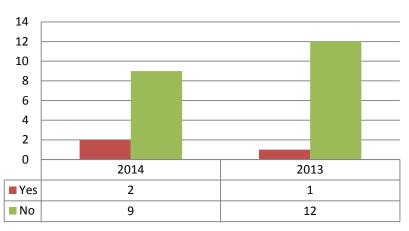
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**Priority Objective 16:** Achieve the four Critical Operational Capabilities, four Enabling Capabilities, and other prioritized objectives, across the National Network of Fusion Centers to enable effective and lawful execution of their role as a focal point within the state and local environment for the receipt, analysis, gathering and sharing of threat-related information.

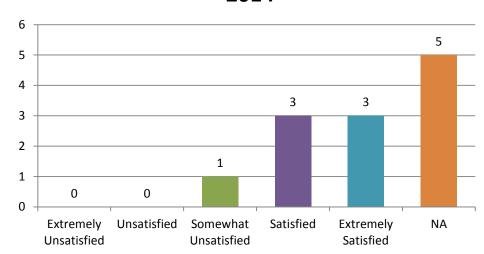
Does your Agency use the Federal Resource Allocation Criteria (RAC) Policy to inform development of personal and other resources (i.e. training deliveries, exercises, etc.) to fusion centers?

## 2013-2014

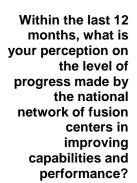


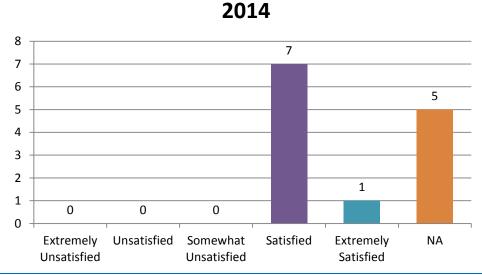
### 

Within the last 12 months, what has been the ability of your office/agency to engage in federal governance structures supporting the national network of fusion centers?

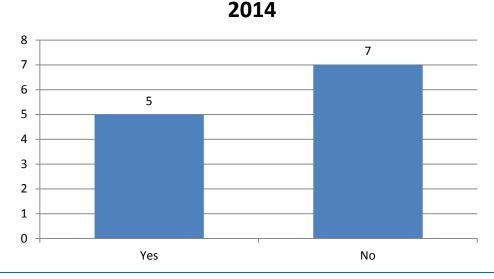




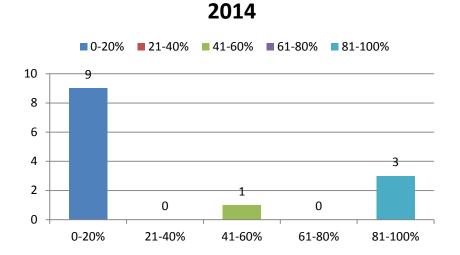




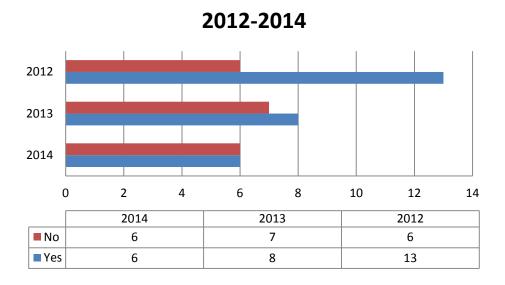
### Within the last year, did you receive a briefing on the annual national Network of Fusion Centers final Report from DHS?



How Often do you engage with DHS on support for fusion centers (i.e. via the **ISA IPC Fusion** Center Subcommittee, via the Information Sharing and **Safeguarding** governance Body (ISSGB) Fusion center Executive Steering Committee, joint training, etc.)?



Does your agency participate in the national Network of Fusion Centers (state and major urban areas)?



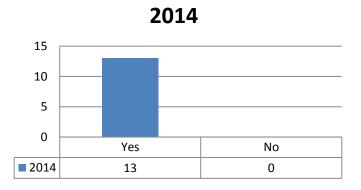
Federal, State, Local, and Tribal Terrorism-related Information Sharing

# **Goal 2: Improve Information Discovery and Access through Common Standards**

**Secondary Mission Areas:** Watchlisting and Screening, Statewide / Regional ISE, Cybersecurity, Transnational Organized Crime (TOC), Domain Awareness, Incident Management

**Priority Objective 2:** Develop guidelines for information sharing and safeguarding agreements to address common requirements, including privacy, civil rights, and civil liberties, while still allowing flexibility to meet mission needs

Does your agency incorporate access policies that protect privacy, civil rights, and civil liberties in compliance with relevant authorities?



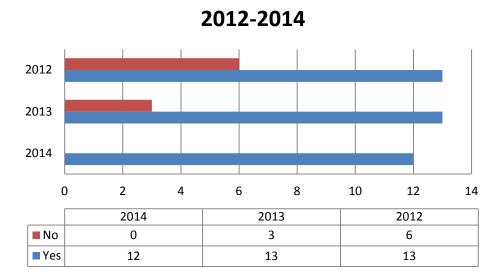
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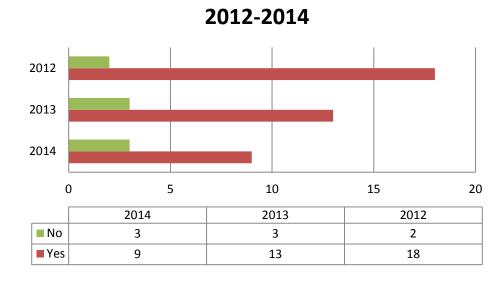
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Does your agency have a defined MOU/MOA development process that covers discovery and access to data by external partners and systems?

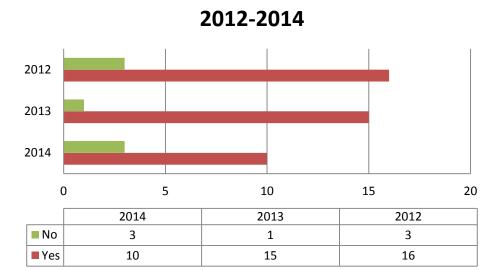


**Priority Objective 4:** Extend and implement the FICAM Roadmap across all security domains.

### 214 Does your agency leverage shared services across agencies for attribute information on users?



Is every member of your agency required to obtain an agency approved security mechanism (example: PKI certificate) for ISE-related systems?



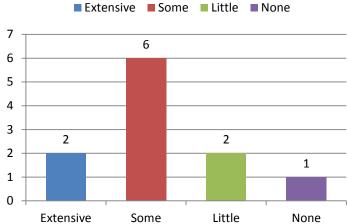
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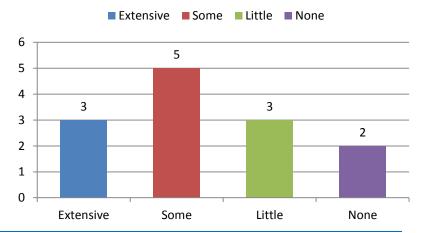
■ Extensive ■ Some

To what extent has your agency implemented FICAM standards on the SBU domain specified by the Identity Federations coordination IFC WG guidance?



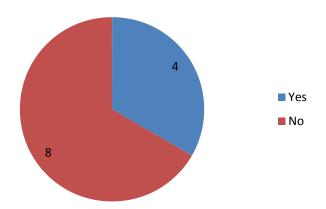


To what extent does your agency use public key infrastructure (PKI) for ISE related information and mission systems on the SBU domain?



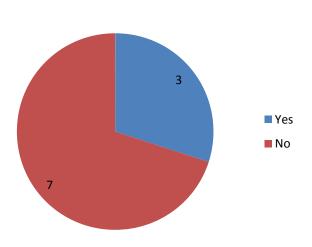
## 2014

Has your agency submitted a data access management plan of actions milestones (POA&M) based on Attribute Access Control?



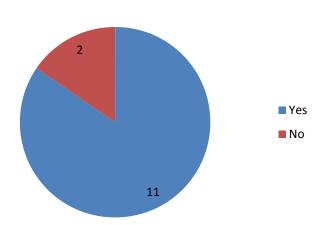


Has your agency submitted a data access management POA&M based on FICAM?



# 2014

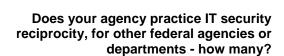
Does your agency accept IT security reciprocity from other Departments and Agencies?

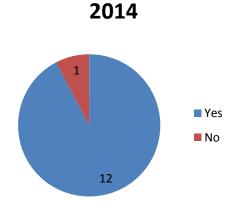


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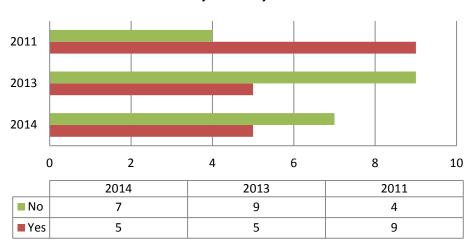
**Priority Objective 5:** Implement removable media policies, processes and controls; provide timely audit capabilities of assets, vulnerabilities, and threats; establish programs, processes and techniques to deter, detect and disrupt insider threats; and share the management of risks, to enhance unclassified and classified information safeguarding efforts.



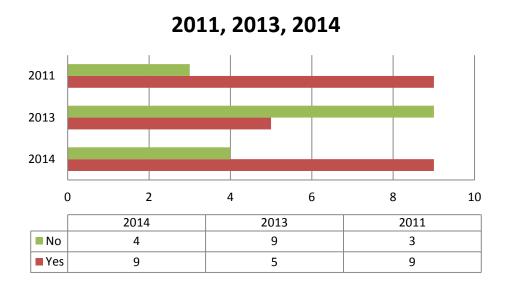


Does your agency practice IT security reciprocity, for State, Local, or Tribal (SLT) governments?

# 2011, 2013, 2014

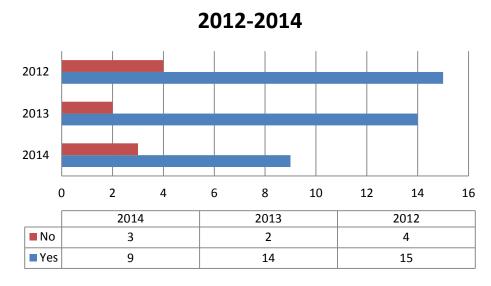


Does your agency practice IT security reciprocity, for other organizations (e.g., private sector, foreign governments)?



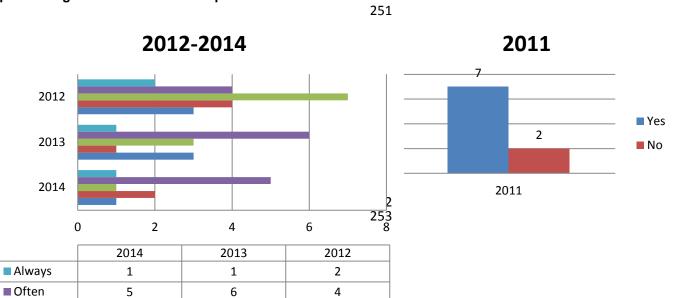
Priority Objective 11: Implement the recommendations and activities of the Federal IT Shared
 Services Strategy among appropriate stakeholders to facilitate adoption of shared services.

Does your agency engage with industry Standards Development Organizations to further voluntary consensus standards?



**Priority Objective 14:** Create a common process across all levels of government for Requests for Information, Alerts, Warnings, and Notifications to enable timely receipt and dissemination of information and appropriate response.

# How Often does your agency reference mission segment architectures (e.g. SAR) when implementing ISE mission business processes?



■ Sometimes

■ Rarely

Never



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# Goal 3: Optimize Mission Effectiveness through Shared Services and

### **Interoperability**

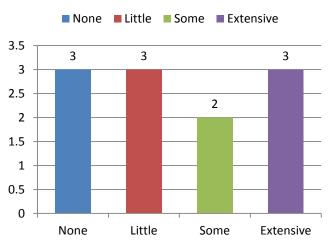
Secondary Mission Areas: Incident Management

**Priority Objective 2:** Develop guidelines for information sharing and safeguarding agreements to address common requirements, including privacy, civil rights, and civil liberties, while still allowing

262 flexibility to meet mission needs

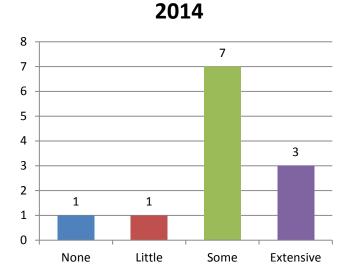
To what degree does the organization incorporate the ISSA common procedures into your information sharing agreements

processes?



2014

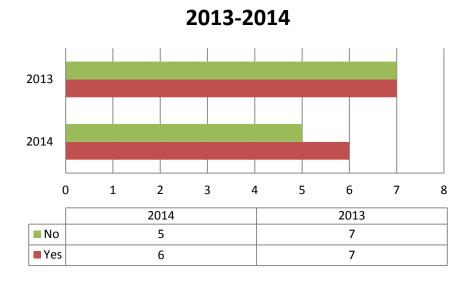
To what degree have automation tools and best practices been established to provide digital policy management capabilities?



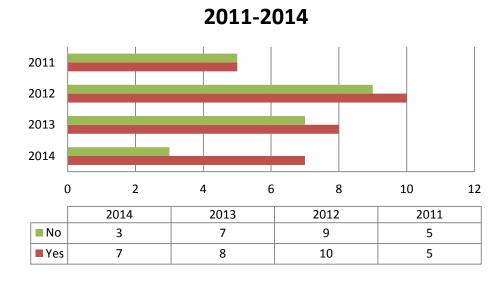


**Priority Objective 3:** Adopt metadata standards to facilitate federated discovery, access, correlation, and monitoring across Federal networks and security domains.

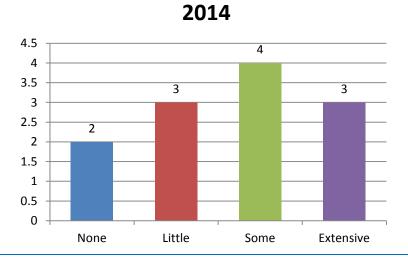
Does your agency plan to fund the integration of CUI SBU and/or unclassified requirements into information systems as they are developed and/or upgraded on or before the deadline?



Has your agency connected with inter-agency SBU/CUI networks in order to share terrorism and homeland security information?

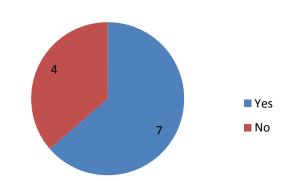


To what extent has your agency begun acquisition/procurement for a data tagging capability (on each security domain) that employs common, interoperable metadata standards?



2014

Has your agency aligned its enterprise architecture for identity management (on each security domain) with the FICAM Roadmap?



Has your agency (with DOJ and ODNI coordination) implemented an SBU federated search capability for interoperable use by RISS, LEO, and HSIN?

Only one agency responded to this question, with "Yes"

Has your agency (with DHS coordination) tested a federated SBU SEARCH Tool service capability for interoperable use by RISS, LEO, Intelink, and HSIN?

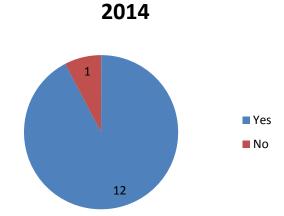
Three agencies responded: 1 "Yes" and 2 "No"

Has your agency participated in the development of (with emphasis on GeoPlatform) joint, interoperable geospatial reference architecture for inclusion in the ISE Interoperability Framework

Three agencies responded: 1 "Yes" and 2 "No"

### (I2F)?

Does your agency have a repeatable process to nominate standards, reference architectures, or operational capabilities for reuse?



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Priority Objective 6: Define and adopt baseline capabilities and common requirements to enable
 data, service, and network interoperability.

To what degree is there improvement in your agency's terrorism information sharing processes (since last year's survey) with other ISE partners by implementing an ISE Shared Space in your organization? Please explain.

2014: two agencies responded; one responding with 0-20% and the other responding 81-100%.

2011: This question was asked as "Has access to terrorism information from ISE partners been

improved by utilizing their designated ISE Shared Space?" 75% responded with "Yes" and 20%

Responded with "No." Eight agencies in total responded.

None

2012-2013 ■ Extensive Some Little 

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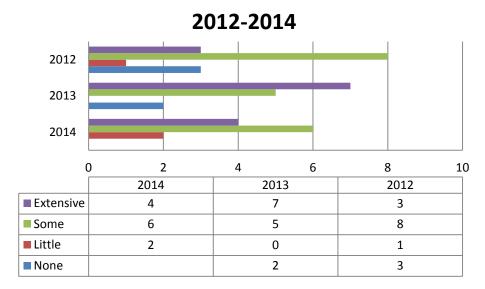
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**Priority Objective 8:** Define and implement common processes and standards to support automated policy-based discovery and access decisions.

To what extent has your agency's ability to discover, access, and retrieve information needed to accomplish the mission improved based on services shared from external agencies and systems?



Is your agency accessing more information now than a year ago? 292

2014: Two agencies responded in 2014, both responding with "Yes."

2013: Two agencies responded in 2013, both responding with "Yes."

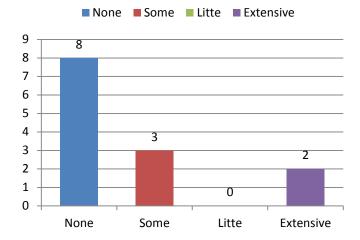
Does your Agency utilize a Data analytics Platform to analyze information received from data

298 2014: Two agencies responded in 2014, both responding with "Yes." **Priority Objective 10:** Develop a reference architecture to support a consistent approach to data discovery and correlation across disparate datasets.

To what level has access to terrorism information from ISE partners improved by utilizing their designated ISE Shared Space? One agency responded to this question with "Yes"

### 2014

To what extent does your agency utilize the Building Blocks toolkit to develop, identify, evaluate, and select high value data sets based on mission needs for interagency information exchanges?



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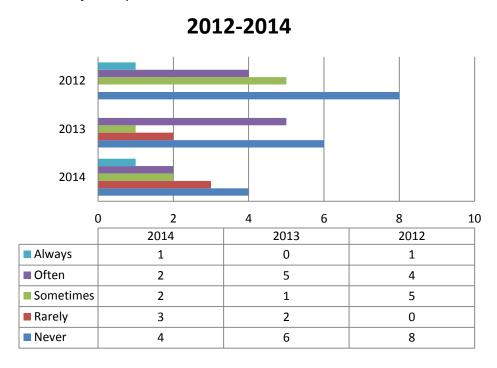
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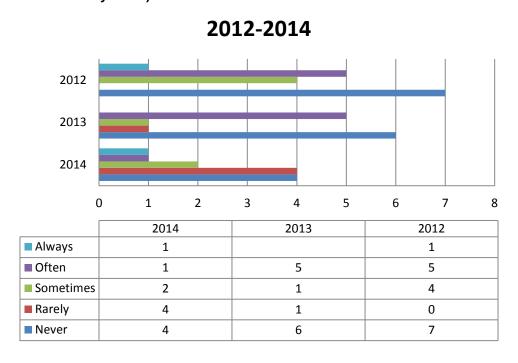
**Priority Objective 12:** Refine standards certification and conformance processes enabling standards-based acquisition among departments and agencies, standards bodies, and vendors to promote interoperable products and services.

To what extent are ISE functional Standards used when issuing mission system RFPs and/or Grants (for ISE-related systems)?



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# To what extent are ISE Technical Standards used when issuing mission system RFPs and/or Grants (for ISE-related systems)?



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**Priority Objective 16:** Achieve the four Critical Operational Capabilities, four Enabling Capabilities, and other prioritized objectives, across the National Network of Fusion Centers to enable effective and lawful execution of their role as a focal point within the state and local environment for the receipt, analysis, gathering and sharing of threat-related information.

### What percentage of critical milestones has the HSIN integration successfully met?

2014: Only one agency was given this question, and they reported 80-100%.

2013: The same agency reported 41-60% in 2013.

326 2012: The same agency reported 61-80% in 2012.

# Goal 5: Protect Privacy, Civil Rights, and Civil Liberties through

## **Consistency and Compliance**

Secondary Mission Areas: Watchlisting and Screening, Statewide / Regional ISE, Transnational

331 Organized Crime (TOC), Domain Awareness.

**Priority Objective 2:** Develop guidelines for information sharing and safeguarding agreements to

address common requirements, including privacy, civil rights, and civil liberties, while still allowing

334 flexibility to meet mission needs.

Has your Agency developed and provided an ongoing training program specific to the implementation of the ISE Privacy Guidelines to personnel authorized to share protected information through the ISE and for reporting violations of its ISE privacy policy?

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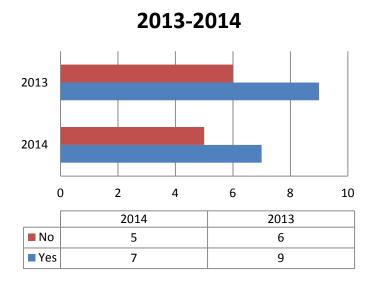
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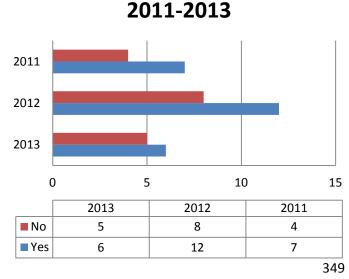
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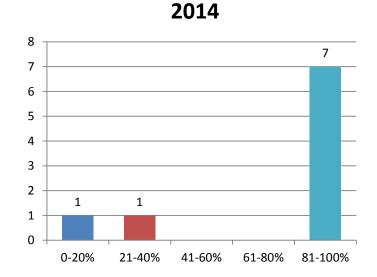
ISE?

Approximately, how many personnel with information sharing responsibilities received training on your agency's Privacy, Civil Rights, Civil Liberties (P/CR/CL) policies, to include your agency's ISE Privacy Policy?

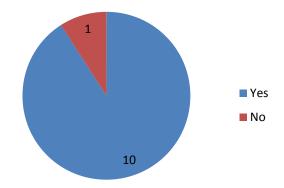
### In 2011 -2013 used the following language:

"Have personnel with information sharing responsibilities received training on your agency's privacy and civil liberties policies, to include your agency's ISE Privacy Policy?"

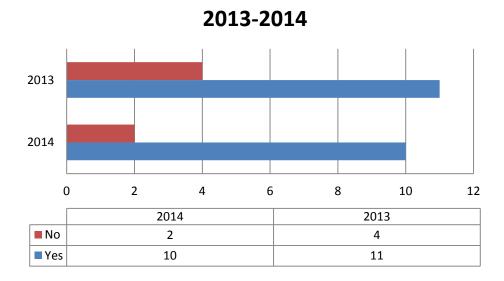




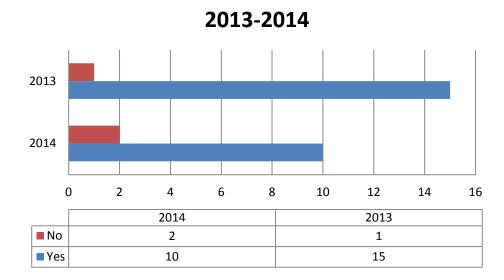
Has your Agency established and enforced policies and procedures for investigating and responding to violations of policies?



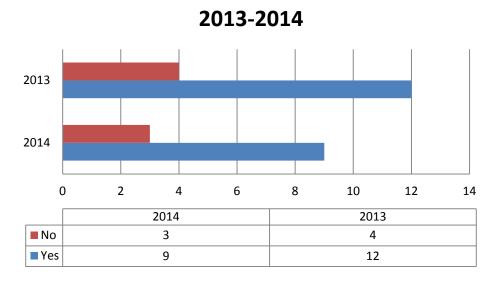
Has your Agency taken steps to facilitate appropriate public awareness of its policies and procedures for implementing the ISE Privacy Guidelines?



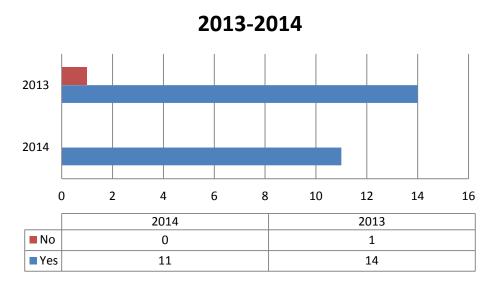
Is your agency's P/CL office (led by a P/CL officer or Senior Agency Official for Privacy) actively involved in planning, development, and oversight of information sharing and safeguarding activities?



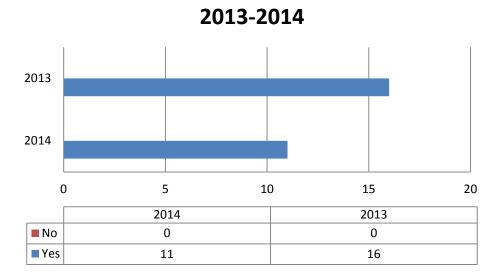
Does your Agency Notify ISE participants who receive the Agency's protected information of All applicable access, use, retention, or disclosure limitations in cases where personally identifiable information of individuals is being shared?



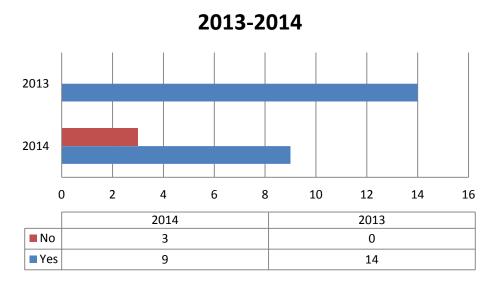
Does your Agency review protected information for accuracy before it is made available to the ISE?



Has your Agency adopted / implemented procedures to facilitate the prevention, identification, correction of errors in protected information with the objective of ensuring information is accurate has Not erroneously been shared through the ISE?



Has your Agency implemented adequate review and audit mechanisms to eNAble the Agency's ISE PCL Official and other authorized officials to verify that the Agency and its personnel are complying with the ISE Privacy Guidelines?



Has your Agency put in place internal procedures to address complaints from persons regarding protected information about them that is under the Agency's control?

